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In Pro Per

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

Neha Gupta

PLAINTIFF

EDCV23-2032-FMO(SHKx)

Vs

Hunter Biden, Claire Boucher, Kim Kardashian
 DEFENDANTS

Facts:

- In 2018 Hunter Biden placed cameras in plaintiff's bedroom to monitor plaintiff and in 2019 bathroom was added. Hunter Biden also had access to laptop and phone of the plaintiff as these were bugged by him and the plaintiff was under constant observation. The plan was to provoke plaintiff into sending emails that would be used for political purposes.
- The updates from these cameras were first shared with Claire Boucher latest by early 2019.
- The plaintiff moved to Hartford for a new job in April 2019. In her first residence at Park Place Apartments, one of her neighbors, called Harold, who worked for the building and had keys of the apartment the plaintiff lived in with her roommate, flirted with her roommate and once helped her roommate with keys to the apartment, after she had locked herself out. He also had access to information from inside the apartment. He shared this information with Hunter Biden.
- The plaintiff changed her residence to Spectra Pearl Apartments Hartford, room number 503. Plaintiff has reasons to believe it was her neighbor in room number 501 who manned the cameras (in the bedroom and bathroom). Like Harold, he had keys and worked for the building.
- In 2020 November, December and January Hunter Biden shared the videos from the cameras with Kim Kardashian. Kim and others in her friend circle mocked the plaintiff using the videos obtained from her bedroom and laptop. He could have done this earlier as well without the plaintiff finding out.
- In January 2021, Claire shared an email plaintiff had sent to a group of people and a WhatsApp message plaintiff had sent to her brother, with Elon Musk. Plaintiff has reasons to believe the email and WhatsApp were shared in a manner that would cause anger. Elon Musk was angered enough by the email and WhatsApp messages to want to get the plaintiff deported from the United States. Before doing it he decided to check plaintiff's privacy invasion claims and found not only cameras in her bedroom and bathroom but the updates being routed to Claire. He also found Kim Kardashian and others mocking plaintiff using videos from her bedroom.
- Elon Musk shared what he observed with close friends and family members. Elon Musk also supported the plaintiff after this incident while Kim Kardashian and Claire Boucher tried to justify the cameras and the privacy invasion by blaming these on plaintiff, accusing the plaintiff of acting in a manner that necessitated the cameras.

- After Elon Musk objected to cameras in the plaintiff's apartment, Kim Kardashian shared the fact that she had used bedroom cameras on the plaintiff with people in her friend circle. One of these people was Priyanka Chopra, Priyanka Chopra further shared this with her friends in India.
- When Elon Musk split from Claire Boucher in September 2021, Kim supported Claire and further mocked the plaintiff using both cameras in her bedroom and bathroom, and social media feed.
- All through 2021, Claire and Hunter maintained that the cameras were placed to help Priyanka Chopra, an actress the plaintiff had complained about.
- In 2021, they added more cameras to plaintiff's phone, TV, laptop and apartment to monitor the plaintiff at face expression level every second of the day. They also got updates from streets and supermarkets and everywhere the plaintiff went. They could accomplish this because they had both, keys to plaintiff's apartment and complete knowledge of plaintiff's whereabouts every single second of every day. They were also helped by the fact that the plaintiff got most of her devices shipped to her.
- Since 2021 January, Claire and Kim have not only received updates from all the sources they had access to previously but additional sources as well. They have used this information to actively harass the plaintiff, to the point of emotional breakdown and tried to harm her reputation in all the important circles they belonged to by profession or relationships.
- In 2021, they also started messing with the food of the plaintiff, adding depressants and other additives to provoke her into giving a reaction they could then use to justify the cameras.
- The cameras never stopped even after the fact became known to important people (Bill Gates, Melinda Gates, Jeff Bezos, Lauren Sanchez, Richard Branson and others). Claire Boucher along with Kim Kardashian and others regularly received updates from the plaintiff's apartment, devices and even streets and supermarkets.
- They receive very minute emotional expression level updates from the plaintiff's cell phone and laptop as well.

Hunter Biden

1. Privacy Invasion- Intrusion into Seclusion, Public Disclosure of Private Facts
Hunter placed countless number of cameras in plaintiff's apartment, devices and frequent spots and sent updates he obtained in this manner to defendant Claire.
Hunter Biden paid the person who lived in the apartment next to plaintiff to monitor plaintiff using cameras placed in the plaintiff's apartment. He also got plaintiff's phone, laptop and other devices bugged to monitor plaintiff.
2. Witness Tampering
Hunter repeatedly gave the false motive whenever quizzed about the motives and tried to influence the witnesses to deny the truth.
3. Stalking
Hunter got the plaintiff stalked to make sure that the plaintiff is under constant observation. He also got the plaintiff harassed through Uber drivers, passersby and co-passengers. Hunter also scared the plaintiff after his involvement came out by messing with the food and on multiple occasions leaving objects in plaintiff's apartment.

In 2017, Hunter Biden asked Chris Tucker to scan the plaintiff to see if the plaintiff would be useful for a plan of his. The plan was to provoke the plaintiff into doing stuff that could be used against someone more important. Chris Tucker had joined the program only to scan the plaintiff and responded in affirmative by January 2018, when the cameras were placed in the apartment of the plaintiff. Hunter

Biden already had access to plaintiff's phone and laptop as they had been previously bugged by some of his friends in Europe. Since, Hunter Biden has access to the following information on the plaintiff:

- a. Phone: voice, screen recording, chat, texts, email, cameras
- b. Laptop: screen recording, cameras, email, documents
- c. Cameras in the apartment: bedroom, bathroom
- d. Cameras outside: Streets and supermarket

In each of these apartments Hunter paid a person who worked for the building to very carefully monitor the plaintiff for any and every emotion and shared these with Claire and others. Likewise, whenever the plaintiff watched any movie or read anything or browsed anything, those who monitored her for Hunter Biden very carefully noted what the plaintiff was feeling and how she responded to in every situation.

In June 2020, Hunter tried to get the plaintiff hired into Google.

Claire Boucher

1. Privacy Invasion- Intrusion upon Solitude, False Light

Claire received updates from the person stationed near plaintiff's apartment that were sourced from cameras placed in plaintiff's bedroom and bathroom. Other than bathroom and bedroom the updates also covered the emotional responses plaintiff gave while watching movies or reading anything on her phone, laptop or TV. The updates also included streets and supermarkets and everywhere else it was possible to put cameras.

Claire selectively shared these updates with people in her friend circle with the aim of destroying plaintiff's reputation.

Claire also on innumerable occasions asked for additional information and asked people to put specific feed in plaintiff's social media stream to check her reaction after using information obtained from her bathroom or bedroom with the intention of destroying plaintiff's reputation.

2. Privacy Invasion- Intrusion upon Solitude

Claire had access to all information possible with the current state of the art in the technology on the plaintiff. She received information from plaintiff's phone, laptop, bedroom, bathroom, street, supermarkets.

Claire began receiving such information latest by early 2019. Since then, Claire has received thousands of updates on plaintiff's life and activities invariably obtained by invading her privacy.

3. Privacy Invasion- Public Disclosure of Private Facts

In January 2021, Claire shared the email (that plaintiff sent to a bunch of people) and WhatsApp messages that plaintiff had sent to her brother with Elon Musk with the aim of using those messages against someone more important. To the plaintiff's best judgement, the email and WhatsApp were shared in a manner that would cause anger.

Elon Musk got angry at the plaintiff even though the email and WhatsApp messages were only complaints on invasion of privacy. He then sought to check those claims before taking any action and found plaintiff under constant surveillance of her neighbors who had access to her bathroom and bedroom among other places. He also found close friends of Claire, Kim Kardashian and her friends mocking plaintiff using videos from her bathroom.

Post 2021, January, Claire along with Hunter and Kim asked Elon Musk, plaintiff's main support, to get increased updates from plaintiff's bedroom, bathroom and devices to test unlimited theories she and others came up with daily. These increased updates came from a constantly increasing invasion of plaintiff's privacy, which was intrusive into every single aspect of plaintiff's life.

Kim Kardashian

1. Privacy Invasion- Public disclosure of Private Facts
Kim mocked the plaintiff using videos obtained from plaintiff's bedroom as well as plaintiff's laptop. Kim also shared the information of a very personal and sensitive nature with a lot of other people in her friend circle.
2. Privacy Invasion – False Light
Kim supported Claire in portraying plaintiff as a person of low integrity in order to rid plaintiff of the support of very important people who knew the truth, without which plaintiff had no hope of justice. Kim also supported Claire in inflicting the maximum damage possible on plaintiff's reputation and in provoking plaintiff using her influential family and friends.

Consequences of their behavior in Plaintiff's life:

1. Plaintiff is constantly monitored by Claire, Hunter and Kim so she can't afford to leave the lights on when using the restroom and must use the closet to change clothes. Despite this they have managed to harass the plaintiff on several thousand occasions. Claire is fond of passing judgement on what the plaintiff is found doing in her bedroom and bathroom. She is accompanied by Kim.
2. Plaintiff is scared to socialize and emotionally hurt by the mockery she has experienced from Claire and Kim. Kim Kardashian mocked the plaintiff for doing something in her bedroom and enjoys the support of those who placed the cameras and those who paid for them and got updates from them.
3. Plaintiff feels a deep piercing need of justice from all three because they harassed her in the most shameless manner. She is not allowed to feel it because she is always being monitored and her biggest support is Elon Musk who is the boyfriend of Claire Boucher.
4. Claire and Kim monitor the plaintiff constantly whether she is using her laptop, phone or changing clothes. They don't do this themselves but via people who are stationed to monitor the plaintiff. Since 2021 January their only motive is to sully the plaintiff's reputation in the eyes of the important people who know the truth. Plaintiff is unable to lead a life even remotely normal under their malicious gaze.
5. Claire and Kim have tried to reason the motives to be anything but the true motive since the cameras were discovered in 2021. To justify these motives, they have blamed the plaintiff of everything from schizophrenia to wanting to hurt their friend Priyanka (who the plaintiff will sue shortly). To justify their blames, they have tried everything including messing with the plaintiff's food to using the cameras on the plaintiff and her social media feed together.
6. Claire shared the email and WhatsApp written by the plaintiff with Elon Musk in a manner that got him so angry at the plaintiff he almost tried to get her deported from the USA.
7. Hunter Biden continued monitoring the plaintiff throughout 2020, while the plaintiff was struggling to maintain her H1B visa in the United States.
8. Claire and Kim have harassed the plaintiff through social media feed, Uber drivers, co-passengers and passersby. In each of these instances they have used her most personal events which they monitored via the cameras Hunter Biden had placed in her devices and apartment.
9. Hunter Biden got the plaintiff scanned in 2017 itself, the year she entered the USA. He got cameras placed in her apartment in 2018. He already had access to the plaintiff's devices from before she entered the USA. Due to the privacy invasion the plaintiff has had no time to focus on her life or career.
10. On multiple occasions Hunter Biden got plaintiff's food messed up and he never let plaintiff feel secure about her food. On some of these occasions he let the plaintiff know the power he wielded over her by his behavior, as an example by leaving a cockroach on her bed and it's jar on her kitchen counter or by asking someone to enter her apartment in her presence. As a result, the plaintiff completely stopped eating out, ordering food or topicals in her home and leaving her food in her apartment when going out. The plaintiff has not done any of these three since January 2022.

11. The plaintiff fears Hunter and Kim and Claire of doing what they have been doing since 2018 (cameras), 2019 (updates going to Claire and bathroom cameras), 2020 (mockery), 2021 (sullyng her reputation using increased privacy invasion).
12. The plaintiff is really scared of using restroom with the lights on because Kim mocked her, of doing anything Kim can mock in her bedroom and bathroom, of her reputation being targeted by Claire and of her food being messed up by Hunter and of her life being threatened in new and more invasive ways by all three of them.
13. Claire and Kim have, on multiple occasions, tried to provoke the plaintiff by putting provocative or insulting content in her social media feed or by asking passersby to insult the plaintiff in subtle and non-subtle ways using all the access they have into her life.
14. Claire and Kim have spread several baseless rumors about the plaintiff in all the important circles they belong to due to profession and relationships. They have also mocked plaintiff almost continuously in a closer group of friends and told the plaintiff about the mockery via Uber drivers and social media feed.

Wherefore, the plaintiff requests the following relief to the on-going privacy invasion into her life:

1. The Plaintiff should be awarded damages for the emotional distress caused by the defendants: \$ 50,000,000.
2. The Defendants should prove in court that they will stop the ongoing Privacy Invasion, all the means.
3. The Defendants should explain in court on how and why they did it. (Bathroom Mirrors, Bedroom Cameras, Devices (in-screen cameras))
4. All the defendants should be awarded corrective action as deemed suitable by the court.



Dated: 09/29/2023.

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